

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

HUGHES RIVER FM, LLC,  
a Delaware limited liability company,

Plaintiff,

v.

XIMALAYA, INC.,  
a Cayman Islands corporation,  
YU JIANJUN, an individual,  
SEAMAN YU, an individual,  
XIAOYU CHEN, an individual,  
LI HAIBO, an individual,  
and TENCENT MUSIC ENTERTAINMENT  
GROUP, INC., a Cayman Islands  
corporation,

Defendants.

Civil Case No. 1:25-cv-06217

Hon. Edmond E. Chang

**XIMALAYA, INC.’S**

**MOTION TO FILE DOCUMENTS UNDER SEAL**

Ximalaya, Inc. (“**Ximalaya**”) submits this Motion to File Documents Under Seal (“**Motion**”).

1. Ximalaya will be filing the declaration of Jianjun Yu which shall attach: (i) Ximalaya’s Register of Directors (“**Register of Directors**;” Exhibit 1); (ii) portions of Ximalaya’s Shareholder Register (“**Shareholder Register**;” Exhibit 5); and (iii) Exhibit F to the Agreement and Plan of Merger between Ximalaya and Tencent Music Entertainment Group executed on June 10, 2025 (“**Merger Agreement**;” Exhibit 8) (collectively, the “**Documents**”).

2. Plaintiff informed Ximalaya that it will oppose filing anything under seal. Plaintiff and Ximalaya met and conferred as to the Motion and did not come to an agreement.

3. The Documents contain private business-sensitive information that is not otherwise available in the public domain. The Register of Directors contains extensive information regarding Ximalaya's past and present directors, including their personal addresses, which is not available to the public. The redacted portions of the Shareholder Registry contains private information as to Ximalaya's shareholders who are not relevant to this litigation. Exhibit F to the Merger Agreement was not filed publicly and is governed by a confidentiality provision. Public disclosure of such information could cause harm, including, but not limited to, competitive harm by revealing details of business organizations, operations, and decision-making that relevant parties reasonably expect to remain confidential.

4. Therefore, to comply with *Local Rule 26.2(c)*, Ximalaya respectfully requests leave to file the Documents under seal or be redacted.

5. The rule requires Ximalaya to provisionally file the Documents electronically under seal, file electronically at the same time a public-record version of each of the proposed Documents, and move the Court for leave to file the appropriate Documents under seal.

6. In light of the foregoing, Ximalaya hereby respectfully requests that the Court enter an order granting it leave to file the Documents under seal. Ximalaya has proposed that the parties adopt the Model Confidentiality Order of the Northern District of Illinois, with minor revisions. The Plaintiff has proposed extensive edits and changes, which will likely require the Court to settle outstanding matters not currently agreed. Thus, no existing confidentiality order in this action bears upon or impacts this Motion. This Motion and the exhibits to be filed under seal complies with Defendants' proposed Confidentiality Order filed on August 27, 2025.

Dated: August 27, 2025

RESPECTFULLY SUBMITTED,

By: /s/ Vincent Filardo, Jr.

Vincent Filardo, Jr. (*pro hac vice*)

Andrew Sklar (*pro hac vice*)

Yi He (*pro hac vice*)

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*Counsel for Defendant Ximalaya, Inc.*

**CERTIFICATE OF SERVICE**

I, Vincent Filardo, Jr., certify that on August 27, 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filings to all registered users.

Dated: August 27, 2025

By: /s/ Vincent Filardo, Jr.